

ENTERED

March 11, 2024

Nathan Ochsner, Clerk

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	Chapter 11
	§	
FIELDWOOD ENERGY III LLC, et al.	§	Case No. 20-33948 (MI)
	§	
	§	(Jointly Administered)
Post-Effective date Debtors.¹	§	

**THIRD STIPULATION AND AGREED ORDER CONTINUING DEADLINE TO
RESPOND TO PLAN ADMINISTRATOR'S OBJECTIONS TO CLAIMS OF BERKLEY
INSURANCE COMPANY, BERKLEY REGIONAL INSURANCE COMPANY, EVEREST
REINSURANCE COMPANY, AND EVEREST NATIONAL INSURANCE COMPANY
AND REQUEST TO RESET HEARING DATE
[Related to Dkt. Nos. 2848, 2849, 2850, and 2851]**

David Dunn ("Administrator"), as Plan Administrator of Fieldwood Energy III LLC, Fieldwood Energy Offshore LLC, Fieldwood Energy Inc., GOM Shelf LLC and FW GOM Pipeline, Inc., Debtors (the "Post-Effective Date Debtors"); Berkley Insurance Company ("Berkley Insurance"), Berkley Regional Insurance Company ("Berkley Regional") Everest Reinsurance Company ("Everest Reinsurance"), and Everest National Insurance Company ("Everest National" and, collectively with Berkley Insurance, Berkley Regional, and Everest Reinsurance, "Claimants", and together with the Administrator, the "Parties") submit this *Third Stipulation and Agreed Order to Continuing Deadline to Respond to Plan Administrator's*

¹ The Post-Effective Date Debtors, along with the last four digits of each Post-Effective Date Debtor's federal tax identification number, as applicable, are: Fieldwood Energy III LLC (6778); Fieldwood Energy Offshore LLC (4494); Fieldwood Energy, Inc. (4991, GOM Shelf LLC (8107), and FW GOM Pipeline, Inc. (8440). Fieldwood Energy III LLC, Fieldwood Energy Offshore, LLC, and Fieldwood Energy Inc. are managed and operated by the Plan Administrator, whose primary mailing address is 16255 Ventura Blvd., Suite 440, Encino, CA, 91436, C/O Province LLC. GOM Shelf LLC and FW GOM Pipeline, Inc. (collectively, the "Post-Effective Date FWE I Subsidiaries") are managed and operated by Jon Graham, as sole manager of each Post-Effective Date FWE I Subsidiary. The Debtors in the other nine pending chapter 11 cases (which continue to be jointly administered with the cases of the Post-Effective Date Debtors), each of which have either been dissolved or merged into other entities as of the Effective Date, consist of the following: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Offshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703; and Galveston Bay Processing LLC (0422).

Objections to Claims of Berkley Insurance Company, Berkley Regional Insurance Company, Everest Reinsurance Company, and Everest National Insurance Company and Request to Reset Hearing (the “Stipulation”) for entry by the Court, in which the Parties stipulate that:

1. WHEREAS, On August 3, 2020 and August 4, 2020 (as applicable, the “Petition Date”), the Debtors filed voluntary petitions for relief under chapter 11 of the United States Code (the “Bankruptcy Case”) in the United States Bankruptcy Court for the Southern District of Texas (the “Court”).

2. WHEREAS, on August 17, 2023, the Administrator filed objections to the Claimants’ proofs of claim (Claim Nos. 514, 550, 558, 635, 1115 and 1133) as further described in the objections filed at Docket Nos. 2848, 2849, 2850, and 2851 (collectively, the “Objections”).

3. WHEREAS, on September 11, 2023, the Parties filed the *Stipulation and Agreed Order Continuing Deadline to Respond to Certain of Plan Administrator’s Claim Objections and Request to Reset Hearing Date* [Dkt No. 2875].

4. WHEREAS, on September 12, 2023, the Court entered the *Stipulation and Agreed Order Continuing Deadline to Respond to Certain of Plan Administrator’s Claim Objections and Request to Reset Hearing* [Dkt No. 2877].

5. WHEREAS on December 5, 2023, the Parties filed the *Second Stipulation and Agreed Order Continuing Deadline to Respond to Certain of Plan Administrator’s Claim Objections and Request to Reset Hearing Date* [Dkt No. 2978].

6. WHEREAS, on December 7, 2023, the Court entered the *Second Stipulation and Agreed Order Continuing Deadline to Respond to Certain of Plan Administrator’s Claim Objections and Request to Reset Hearing Date* [Dkt No. 2980].

7. WHEREAS, the hearing on the Objections is currently set for March 21, 2024 at 9:00 a.m.

8. WHEREAS, the Claimants' response date to the Objections is currently March 12, 2024.

9. WHEREAS, the Parties have agreed to extend the deadline for the Claimants to respond to the Objections until Thursday, May 9, 2024 (the "Extended Response Deadline").


10. WHEREAS, for the foregoing reasons, the Administrator and Claimants request a continuance of the March 21, 2024 hearing with respect to the Objections. The Administrator and the Claimants request the hearing be continued until after the Extended Response Deadline to a date that the Court is available.

NOW, THEREFORE, based upon the agreement of the Parties, and for good cause shown, it is hereby **ORDERED, ADJUDGED** and **DECREED** that:

1. The date for the Claimants to respond to the Objections is continued until May 9, 2024.

2. The hearing on the Administrator's Objections [Dkt Nos. 2848, 2849, 2850, and 2851] is set for May 21, 2024 at 10:30 a.m.

Signed: March 11, 2024


Marvin Isgur
United States Bankruptcy Judge

IN WITNESS WHEREOF, this Stipulation has been executed and delivered as of the day
and year first below written.

Dated: March 7, 2024

**BONDS ELLIS EPPICH SCHAFFER
JONES LLP**

By: /s/ Ken Green
Ken Green
Texas State Bar No. 24036677
Aaron Guerrero
Texas State Bar No. 24050698
Bryan Prentice
Texas State Bar No. 24099787
950 Echo Lane, Suite 120
Houston, Texas 77024
Telephone: (713) 335-4990
Facsimile: (713) 335-4991
Email: ken.green@bondsellis.com
aaron.guerrero@bondsellis.com
bryan.prentice@bondsellis.com

**ATTORNEYS FOR DAVID DUNN, THE
PLAN ADMINISTRATOR FOR THE
POST-EFFECTIVE DATE DEBTORS**

CHIESA SHAHINIAN & GIANTOMASI PC

By: /s/ Armen Shahinian
Armen Shahinian, Esq.
(admitted *pro hac vice*)
Scott A. Zuber, Esq.
(admitted *pro hac vice*)
Darren Grzyb, Esq.
(admitted *pro hac vice*)
Jase A. Brown, Esq.
(admitted *pro hac vice*)
105 Eisenhower Parkway
Roseland, New Jersey 07068
Tel: 973-530-2077
Email: dgrzyb@csglaw.com

**ATTORNEYS FOR BERKLEY INSURANCE
COMPANY, BERKLEY REGIONAL
INSURANCE COMPANY, EVEREST
REINSURANCE COMPANY, AND EVEREST
NATIONAL INSURANCE COMPANY**

CERTIFICATE OF SERVICE

I hereby certify that on the 7th day of March, 2024 a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Ken Green

Ken Green